

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARIO LACY,)	
Plaintiff)	C.A No. 04-11492REK
)	
v.)	PLAINTIFF MARIO LACY'S MOTION TO
)	EXTEND DISCOVERY DEADLINE
WILLIAM J. FEENEY, KENNETH)	
HEARNS, JUAN J. SEOANE,)	
and the CITY OF BOSTON,)	
Defendants)	
)	

Now comes the Plaintiff Mario Lacy in the above-captioned proceeding, and respectfully requests that this Honorable Court extend the discovery deadline from August 26, 2005 to November 10, 2005. As grounds therefor, Plaintiff states as follows:

1. The parties have conducted and completed all written discovery in this matter;
2. The plaintiff has conducted two depositions; the defendant has deposed the plaintiff;
3. The plaintiff hopes to conduct one final deposition, of Officer Jean Aclogue.
4. On May 11, 2005, the plaintiff filed a motion to amend his complaint to add Jean Aclogue as a defendant; as grounds therefor, plaintiff explained that Mr. Aclogue's actions had mistakenly been attributed to another police officer, Juan Seoane;
5. The court has not yet ruled on plaintiff's motion to amend; accordingly, it would be premature to the plaintiff to have deposed Mr. Aclogue prior to the August 26, 2005 discovery deadline;
6. The parties have tentatively agreed upon the date of November 7, 2005, for Mr. Aclogue's deposition should the court rule in the plaintiff's favor;

7. With the exception of this single deposition, discovery is complete;
8. Defendant counsel does not object to this Motion.

Respectfully submitted,
The Plaintiff Mario Lacy,
By his attorneys,

//S//Stephen Hrones
Stephen B Hrones (BBO No. 242860)
Jessica D Hedges (BBO No. 645847)
HRONES GARRITY & HEDGES LLP
Lewis Wharf-Bay 232
Boston, MA 02110-3927
T)617/227-4019

CERTIFICATE OF SERVICE

I, Stephen Hrones, hereby certify that on this 31st day of August, 2005, I served a true and correct copy of the foregoing PLAINTIFF MARIO LACY'S MOTION TO EXTEND DISCOVERY DEADLINE, where unable to do so electronically, by United States First-Class Mail, postage prepaid, as follows: Karen Glasgow, Esq., Jim Chernetsky, Esq., Civil Rights Div/Law Dept, City Hall, Rm 615, Boston, MA 02201.

//S//Stephen Hrones
Stephen Hrones